

CORRES. CONTROL
OUTGOING LTR NO.

DOE ORDER # 4700.
94 RF 06608

EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

June 16, 1994

94-RF-06608

Robert H. Birk
Environmental Restoration Division
DOE/RFPO

OPERABLE UNIT (OU) 3 ENVIRONMENTAL EVALUATION (EE) – MSB-029-94

On May 31, 1994, the Environmental Protection Agency (EPA), the Colorado Department of Health (CDH), the Department of Energy (DOE), and EG&G Rocky Flats, Inc. (EG&G) met to discuss the analysis phase of the OU 3 EE. This meeting was followed by the OU 3 EE meetings held June 1, 1993 and February 14, 1994 during which an approach was developed to conduct a cursory ecological assessment and a comprehensive exposure assessment. The rationale for this approach is based on the anticipated regulatory requirement to demonstrate that potential contaminants of concern do not pose any adverse effects to the ecosystem, even though the ecosystem appears healthy.

The results of the May 31, 1994 meeting indicate that the regulatory agencies prefer that we conduct a more comprehensive ecological assessment and determine if an exposure assessment is needed on the basis of the ecological assessment results. The assumption for this approach is that if the ecosystem appears healthy, then there are no toxicological effects of concern and an exposure assessment is not necessary.

As a result of the May 31, 1994 meeting, we propose a collaborative screening evaluation of the ecological effects assessment benthic invertebrate data from OU 3. The goal of this screening assessment is to evaluate if the data support a "de minimis" risk scenario. EG&G will provide spreadsheet data on the abundance of macroinvertebrates at each sampling site in each reservoir. A comparable spreadsheet of the collocated sediment physical/chemistry data will also be provided so that a direct comparison of ecological endpoints and sediment physio/chemical data can be made. The EG&G aquatic ecologist will facilitate a collaborative effort between agency experts at EPA, CDH and our subcontractor responsible for the EE. The available data will be evaluated and summarized in a "white paper," which documents the consensus view and professional judgement of the group. We propose to have this paper peer-reviewed by local academic experts, incorporate their comments, and provide the document to the subcontractor for use as appropriate in a modification of the problem formulation and effects assessment portion of the EE. Should the "de minimis" risk scenario be supported by the findings of the group and the peer review, the exposure assessment portion of the analysis phase will be scaled to the appropriate level of activity.

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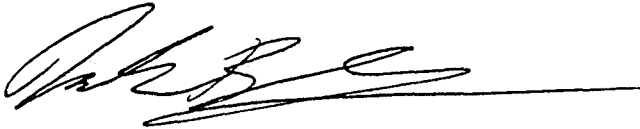
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We recommend applying this approach to the benthic macroinvertebrates and the terrestrial receptors and that an exposure assessment still be conducted for the remaining aquatic receptors (i.e., fish). This is recommended because sampling of these receptors has been collocated with sampling of abiotic media. This allows direct correlation of cause and effect relationships. Aquatic receptors will require an exposure assessment due to their mobility and other confounding factors which influence species occurrence (i.e., Colorado Division of Wildlife stocks the systems with various fish species).

We propose a schedule of activities to begin after the data are compiled by the subcontractor by June 25, 1994. We recommend that the above-mentioned approach be proposed to the agencies for approval.

Please call me at extension 8519 if you have any questions.

A handwritten signature in black ink, appearing to read 'Mark S. Buddy', with a long horizontal line extending to the right.

Mark S. Buddy
Operable Unit 3 Project Manager
Environmental Restoration Management
EG&G Rocky Flats, Inc.

THS:jlh

Orig. and 1 cc - R. H. Birk